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## BEFORE THE

## Federal Communications Commission

WASHINGTON, D. C. 20554

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JUL 1 5 1993

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of

Allocation of the 219-220 MHz ) Band for Use by the Amateur Radio Service

ET Docket No. 93-40

The Commission To:

## COMMENTS OF APCO

The Associated Public-Safety Communications Officers, Inc. ("APCO") hereby submit the following comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding, FCC 93-119 (released March 22, 1993).

APCO is the nation's oldest and largest public safety communications organization representing the interests of all elements of the public safety radio community. APCO has nearly 10,000 members involved in the management and operation of radio communications systems for police, fire, state and local government, emergency medical, forestry conservation, highway maintenance, and other public safety services. Many APCO members are amateur radio licensees and/or work closely with amateur radio operators in coordinating emergency response activities.

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APCO supports the FCC's proposal as set forth in the Notice. Nationwide, many public safety services have built disaster plans that rely upon the Amateur Radio Service. The history of their performance in disaster situations is evidence of the valuable contribution they have made, and continue to make.

Amateurs have been pioneers in the use of packet radio, and have established nationwide packet radio networks. This is a valuable asset in providing assistance to local authorities in disaster situations as amateur packet radio stations have the capability to use modern technology to

Therefore, APCO endorses the proposed rulemaking and urges the Commission to proceed without delay. The proposal is in the best, interest of effective encotrum utilization